



Cullen and Dykman LLP
One Battery Park Plaza
New York, NY 10004
T: 212.732.2000
F: 212.825.1531

RICHARD A. COPPOLA
PARTNER
DIRECT: 212-510-2250
DIRECT FAX: 212-742-1219
EMAIL: rcoppola@cullenllp.com

July 7, 2023

VIA ECF and E-MAIL

The Honorable Victor Marrero, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312
ChambersNYSDMarrero@nysd.uscourts.gov

Re: *Weiha Lianqiao International Coop Group Co. Ltd., v. A Base IX Co. LLC, et al.*
– Case No. 1:21-cv-10753-VM

Dear Judge Marrero:

This letter is jointly submitted by counsel for Plaintiff Weiha Lianqiao International Coop Group Co. Ltd. (“Plaintiff”) and Defendants A Base IX Co. LLC, David Apperman, and Albert Gammal in the above-referenced action pursuant to Your Honor’s June 30, 2023 Order (*See* Civil Docket Entry No. 75) directing the parties to submit a status report within seven (7) days explaining why they have not complied with the Court’s May 30, 2023 Order (*See* Civil Docket Entry No. 74) requiring the submission of a case management plan.

Discovery is substantially complete in this case. The parties have two remaining discovery disputes that they are continuing to meet and confer regarding and will bring before Magistrate Judge Moses (*See* Civil Docket Entry Nos. 47 and 50) if the need arises. However, the parties do not anticipate needing an updated Case Management Plan after the filing of A Base IX Co. LLC’s Counterclaims to the Amended Complaint (*See* Civil Docket Entry No. 67) and Plaintiff’s Answer to Counterclaims (*See* Civil Docket Entry No. 73).



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Thank you for your time and consideration.

CULLEN AND DYKMAN LLP
Attorneys for Plaintiff

By: 
Richard A. Coppola, Esq.

LAZARUS & LAZARUS, P.C.
Attorneys for Defendants

By: /s/
Yvette Sutton, Esq.